

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

CITIZENS AWARENESS)
NETWORK, INC.,)
Plaintiff,)
)
v.) No. 04cv30114-MAP
)
UNITED STATES OF AMERICA,)
UNITED STATES NUCLEAR)
REGULATORY COMMISSION,)
Defendant.)

UNITED STATES MOTION FOR EXTENSION OF TIME
(Assented to)

The defendant, the United States of America, by its attorney, Michael J. Sullivan, United States Attorney for the District of Massachusetts, moves to extend by two weeks the deadline for responding to the complaint for the reason that the Nuclear Regulatory Commission is sending the plaintiff a document which may affect the disposition of the case. In accordance with Local Rule 7.1, the undersigned Assistant U.S. Attorney certified that she conferred with the plaintiff's counsel, Jonathan Block, and he assents to this motion.

WHEREFORE, the defendant requests that the deadline for responding to the complaint be extended to August 9, 2004.

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

By: /s/Karen L. Goodwin
KAREN L. GOODWIN
Assistant U.S. Attorney
1550 Main Street, Room 310
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(413) 785-0269

DATED: July 23, 2004

CERTIFICATE OF SERVICE

This is to certify that I have this day served upon the person listed below a copy of the foregoing document by depositing in the United States mail a copy of same in an envelope bearing sufficient postage for delivery:

Jonathan M. Block, Esquire
94 Main Street
P.O. Box 566
Putney, VT 05346-0566

Robert L. Quinn, Esquire
Egan, Flanagan and Cohen, P.C.
67 Market Street
P.O. Box 9035
Springfield, MA 01102-9035

This 23rd day of July, 2004.

/s/Karen L. Goodwin
KAREN L. GOODWIN
ASSISTANT UNITED STATES ATTORNEY